

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
GREAT AMERICAN INSURANCE
COMPANY,

Plaintiff,

v.

MARTIN L. SOLOMON, EDWIN W. ELDER,
WILLIAM J. BARRETT, WILLIAM J.
THOMAS, JR., JOHN A. DORE, AND KARLA
VIOLETTO, KINGSWAY FINANCIAL
SERVICES, INC., and AMERICAN CENTURY
HOLDINGS, INC.,

Defendants.
-----X

: CIVIL ACTION

: NO. 07-CIV-6498

NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE

TO: BOUNDAS, SKARZYNSKI, WALSH & BLACK, LLC
One Battery Park Plaza, 32nd Floor
New York, NY 10004

CLEARY GOTTlieb STEEN & HAMILTON
Lewis J. Liman, Esq.
Michelle Kenney, Esq.
Matthew M. Bunda, Esq.
Chris Paton, Esq.
One Liberty Plaza
New York, NY 10006-1470

REARDON GOLINKIN & REED
Scott O. Reed
111 W. Washington St., Suite 707
Chicago, IL 60602

NIXON PEABODY
Harold J. Ruvoldt, Esq.
Ronald J. Hedges, Esq.
Christine M. Riley, Esq.
437 Madison Avenue
New York, NY 10002


LANGLER SIFFERT & WOHL LLP
John S. Siffert, Esq.
Joseph Patrice, Esq.
5000 Fifth Avenue, 33rd Floor
New York, NY 10100

15850-638517
JAN 16 2008

PLEASE TAKE NOTICE that, upon the annexed Affidavit in support of this motion and the Certificate of Good Standing annexed thereto, we will move this Court before the Honorable Richard M. Berman at the United States District Courthouse for the Southern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of Robert L. Hickok, a member of the law firm of Pepper Hamilton LLP and a member in good standing of the Bars of the Commonwealth of Pennsylvania, State of New Jersey and the District of Columbia, as attorney to the bar of this Court *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against Mr. Hickok in any state or federal court.

Dated: New York, New York
January 17, 2008

Respectfully submitted,



Kenneth J. King (KK 3567)
PEPPER HAMILTON LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
kingk@pepperlaw.com
(212) 808-2700

Attorneys for Plaintiff
Great American Insurance Company

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
GREAT AMERICAN INSURANCE	: CIVIL ACTION
COMPANY,	:
	:
Plaintiff,	:
v.	: NO. 07-CIV-6498
	:
	:
MARTIN L. SOLOMON, EDWIN W. ELDER,	:
WILLIAM J. BARRETT, WILLIAM J.	:
THOMAS, JR., JOHN A. DORE, AND KARLA	:
VIOLETTO, KINGSWAY FINANCIAL	:
SERVICES, INC., and AMERICAN CENTURY	:
HOLDINGS, INC.,	:
	:
Defendants.	:
-----X	

AFFIDAVIT OF KENNETH J. KING
IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

KENNETH J. KING, being duly sworn, hereby deposes and says as follows:

1. I am an attorney admitted to practice in the State of New York. I am a partner with the law firm of Pepper Hamilton LLP, counsel for defendants in the above-captioned matter.

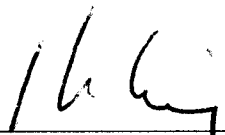
2. I make this Affidavit in support of the motion for the admission of Robert L. Hickok to practice *pro hac vice* in the above-captioned matter.

3. Mr. Hickok is a partner with the law firm of Pepper Hamilton LLP. As shown in the Certificate of Good Standing annexed hereto, Mr. Hickok is a member in good standing of the Bars of the Commonwealth of Pennsylvania, the State of New Jersey, and the District of Columbia.

4. There are no pending disciplinary proceedings against Mr. Hickok in any State or Federal court.

5. It is respectfully requested that the Court grant the motion for an order permitting Robert L. Hickok to appear in this action as counsel for defendants for all purposes *pro hac vice*. A proposed order for Mr. Hickok's admission *pro hac vice* is appended hereto.

Dated: New York, New York
January 17, 2008



Kenneth J. King (KK 3567)

Sworn to before me this
17th day of January, 2008



Notary Public

MICHAEL PALITZ
Notary Public, State of New York
No. 01PA6133474
Qualified in Westchester County
Commission Expires 9/19/2011

Supreme Court of New Jersey

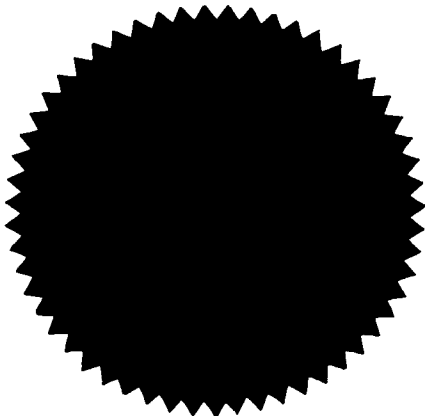


Certificate of Good Standing

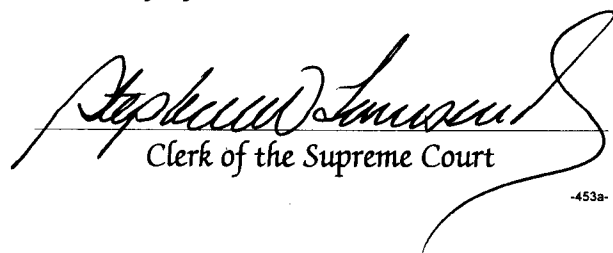
This is to certify that **ROBERT LYMAN HICKOK**
(No. **003401995**) was constituted and appointed an Attorney at Law of New
Jersey on **May 31, 1995** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
9TH day of January , 20 08


Clerk of the Supreme Court



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

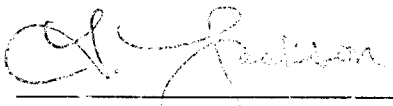
I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

ROBERT L. HICKOK

was on the 17TH day of JULY, 1981
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
December 20, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk



Supreme Court of Pennsylvania

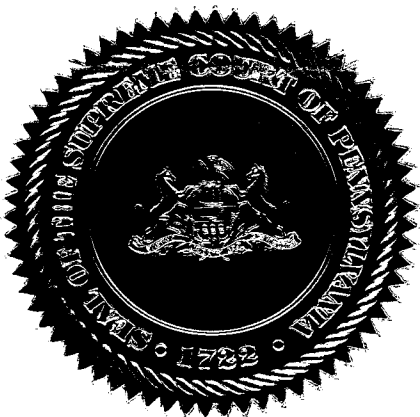
CERTIFICATE OF GOOD STANDING

Robert L. Hickok, Esq.

DATE OF ADMISSION

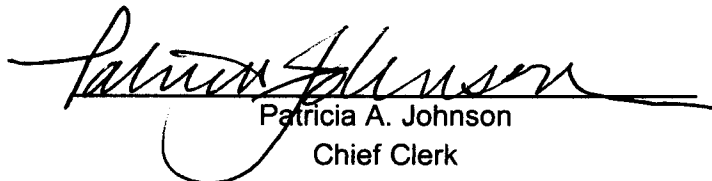
October 15, 1979

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: January 4, 2008


Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
GREAT AMERICAN INSURANCE	:	CIVIL ACTION
COMPANY,	:	
	:	
Plaintiff,	:	
v.	:	NO. 07-CIV-6498
	:	
	:	
MARTIN L. SOLOMON, EDWIN W. ELDER,	:	
WILLIAM J. BARRETT, WILLIAM J.	:	
THOMAS, JR., JOHN A. DORE, AND KARLA	:	
VIOLETTO, KINGSWAY FINANCIAL	:	
SERVICES, INC., and AMERICAN CENTURY	:	
HOLDINGS, INC.,	:	
	:	
Defendants.	:	
-----X		

ORDER GRANTING ADMISSION TO PRACTICE PRO HAC VICE

The motion for admission to practice *pro hac vice* in the above-captioned matter is GRANTED. The admitted attorney, Robert L. Hickok, is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Dated:

Robert M. Berman
United States District Judge

cc: Robert L. Hickok
Court File

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
GREAT AMERICAN INSURANCE	:	CIVIL ACTION
COMPANY,	:	
	:	
Plaintiff,	:	
v.	:	NO. 07-CIV-6498
	:	
	:	
MARTIN L. SOLOMON, EDWIN W. ELDER,	:	
WILLIAM J. BARRETT, WILLIAM J.	:	
THOMAS, JR., JOHN A. DORE, AND KARLA	:	
VIOLETTO, KINGSWAY FINANCIAL	:	
SERVICES, INC., and AMERICAN CENTURY	:	
HOLDINGS, INC.,	:	
	:	
Defendants.	:	
-----X		
STATE OF NEW YORK)		
)ss.:		
COUNTY OF NEW YORK)		

The undersigned, being duly sworn, deposes and says that he is over the age of 18 years, and is not a party to this action.

That, on the 17th day of January, 2008, he caused to be served the within NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF ROBERT L. HICKOK IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, and the AFFIDAVIT OF KENNETH J. KING IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, by first class mail upon:

BOUNDAS, SKARZYNSKI, WALSH & BLACK, LLC	CLEARY GOTTlieb STEEN & HAMILTON
One Battery Park Plaza, 32 nd Floor	Lewis J. Liman, Esq.
New York, NY 10004	Michelle Kenney, Esq.
	Matthew M. Bunda, Esq.
	Chris Paton, Esq.
	One Liberty Plaza
	New York, NY 10006-1470

REARDON GOLINKIN & REED
Scott O. Reed
111 W. Washington St., Suite 707
Chicago, IL 60602

LANKLER SIFFERT & WOHL LLP
John S. Siffert, Esq.
Joseph Patrice, Esq.
5000 Fifth Avenue, 33rd Floor
New York, NY 10100

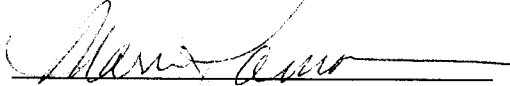
NIXON PEABODY
Harold J. Ruvoldt, Esq.
Ronald J. Hedges, Esq.
Christine M. Riley, Esq.
437 Madison Avenue
New York, NY 10002

the addresses having been designated by said attorneys for that purpose, by depositing a true copy of same, securely enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service.



Michael Palitz

Sworn to before me this
17th day of January, 2008



Notary Public

MARIE A. RAMOS
NOTARY PUBLIC, State of New York
No. 01RA5038297
Qualified in Bronx County
Certificate Filed in New York County
Commission Expires Jan. 23, 2011